

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CRAIG BUCK, et al.

Plaintiffs,

v.

C.A. No. 04-12558-NMG

DEUTSCHE LUFTHANSA, A.G., et al.

Defendants.

**DEFENDANT DEUTSCHE LUFTHANSA, A.G.'S ASSENTED-TO MOTION
AND [PROPOSED] ORDER FOR AN EXTENSION OF TIME TO ANSWER,
MOVE TO DISMISS, OR OTHERWISE RESPOND TO PLAINTIFFS'
AMENDED COMPLAINT**

Defendant Deutsche Lufthansa, A.G. ("Lufthansa") respectfully requests that the Court issue an Order granting it a two-week extension of time, until July 29, 2005, to answer, move to dismiss, or otherwise respond to Plaintiff Craig Buck, et al.'s ("Plaintiffs") Amended Complaint. As grounds for its motion, Lufthansa states as follows:

1. Counsel for Lufthansa have been burdened by extremely busy litigation schedules of late, including a recent summary judgment filing in a substantial case, an appeal of a Magistrate Judge's ruling, a soon-scheduled oral argument before the Ninth Circuit, and a motion for a stay pending appeal in a pro bono case.
2. Lead trial counsel for Lufthansa is scheduled to be away from the office on a long-scheduled vacation beginning later this week.

Pursuant to Local Rule 7.1(A)(2), counsel for Lufthansa states that it conferred with counsel for the Plaintiffs in a good faith attempt to resolve or narrow the issues presented herein, and that Plaintiffs' counsel assented to this Motion.

Respectfully submitted,

Wilmer Cutler Pickering Hale and Dorr LLP
Attorneys for Deutsche Lufthansa, A.G.

By: /s/ Daniel M. Esrick
Daniel M. Esrick, BBO #647676
Wilmer Cutler Pickering Hale and Dorr LLP
60 State Street
Boston, MA 02109
(617) 526-6000
(617) 526-5000 (fax)

OF COUNSEL:

David W. Ogden, Esq.
Ethan G. Shenkman, Esq.
Wilmer Cutler Pickering Hale and Dorr LLP
2445 M Street, NW
Washington, D.C. 20037
(202) 663-6000

Dated: July 11, 2005

CERTIFICATE OF SERVICE

I, Daniel M. Esrick, hereby certify that a copy of the foregoing has been served by electronic mail this 11th day of July, 2005 upon counsel of record for all parties.

/s/ Daniel M. Esrick
Daniel M. Esrick

[PROPOSED] ORDER

Defendant Deutsche Lufthansa A.G.'s Assented-To Motion for an Extension of Time to Answer, Move to Dismiss, or Otherwise Respond to Plaintiffs' Amended Complaint is GRANTED.

The Honorable Nathaniel M. Gorton
United States District Court Judge

Dated: July __, 2005